

Dear Michael Friedmann,

I write to demand that you immediately cease and desist violations of the Preliminary Injunction (PI) entered against you and your firms by the Pierce County Superior Court on Nov. 30, 2018, a copy of which is attached to this order.

It has recently come to my attention that this office and the Better Business Bureau have received a number of complaints from consumers since the date of those injunctions. Some of these complaints allege continuing violations of the PI:

- 1 One alleges that you promised on January 30, 2019, that an item purchased earlier would be sent out in a few hours, that it still had not been delivered by February 14, that the consumer then complained to PayPal, and that you responded by threatening to sue the consumer for defamation and tortious interference in federal court.
- 2 A second consumer alleged he purchased an item on September 13, 2018, that as of December 11, 2018, he had not received it, and that you had stopped responding to his emails.
- 3 A BBB reviewer alleged that you verbally abused her earlier this month for threatening to complain to PayPal.
- 4 Another BBB reviewer stated that you complained to PayPal that you had not received an item, that he then received a \$35 refund, but that he later was contacted by a collection agency seeking \$170, and later by a different collection agency asking for \$230.
- 5 A third BBB reviewer stated on December 13, 2018, that he had paid \$41 for a shirt, had emailed seeking a refund, and had still not received any response.

Please review the attached court order, especially pages 11-13. If you were complying with the order, we should no longer be receiving complaints against you alleging deceptive and abusive behavior. Consumers who were owed refunds should have received them. No one should have been verbally abused or threatened with a lawsuit just for complaining to PayPal. Nor should consumers be hearing from collection agencies after they had already had their purchase price refunded. And you should have provided notice to us of all consumers who had received threats of lawsuits and been contacted by collection agencies, and you should have sent written communications to them and provided copies to us.

Please respond to this letter by Friday, February 22, 2019, stating:

- a That you have come into compliance with all parts of the PI; and
- b What steps you have taken to come into compliance.

Absent a satisfactory response, we will have no choice but to go back to court to seek (1) sanctions against you for contempt of court and (2) additional injunctive relief, including possibly barring you from selling or

purporting to sell goods or services via the internet, since you seem unable or unwilling to do so without violating consumers' rights.

Sincerely,

David M. Horn